

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	19-19446
)	
RANDOLPH E. FIELDS,)	Chapter 13
)	
Debtor(s).)	Hon. Judge: BAER

NOTICE OF MOTION

See attached list.

PLEASE TAKE NOTICE that on **September 4, 2020, at 9:30 a.m.**, I will appear before the **Honorable Judge Baer**, or any judge sitting in that judge's place, and present the **Debtor's Motion to Incur Debt**, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.CourtSolutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movant: Randolph Fields
By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
847-520-8100/mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 4, 2020, before 5:00 p.m.

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov

Glenn Stearns, Chapter 13 Trustee: peterson_p@lisle13.com

To the following persons or entities who have been served via U.S. Mail:

Mr. Randolph Fields
406 S. Mason Street
Bensenville, IL 60106

Sprint Corp
Attention Bankruptcy
PO Box 7949
Overland Park, KS 66207-0949

OneMain
PO Box 3251
Evansville, IN 47731-3251

Harley-Davidson Credit Corp.
PO Box 9013
Addison, Texas 75001

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Jamie Lacerra
4436 Edinburg Lane
Hanover Park, IL 60133

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MOTION TO INCUR DEBT

NOW COMES the Debtor, Randolph E. Fields, by and through their attorney, DAVID M. SIEGEL & ASSOC., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) On July 11, 2019, Debtor filed a voluntary petition for relief pursuant to Chapter 13 of Title 11 USC and Glenn Stearns was appointed Trustee in the case.
- 3) Debtor's Plan will pay the general unsecured creditors 50% of their allowed claims.
- 4) Debtor has been approved for a loan of \$156,610.00, at an interest rate of 5.0% with a monthly principal and interest payment of \$1,365.69, subject to appraisal of the property (Exhibit A).
- 5) Debtor seeks permission to purchase a home with the above terms of financing. Debtor can afford this expense based on his amended schedules I and J (Exhibit B).
- 6) Debtor will benefit by purchasing this home because he will build equity in a home instead of renting housing like he currently does.

WHEREFORE, the Debtor, Randolph E. Fields, pray that this Honorable Court enter an Order to Incur Debt, and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II
Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor